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Duwanish Manning GIS  
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## MEMORANDUM

**DATE:** March 29, 2002 Anchorage

**TO:** Mr. David Williams, Ms. Carla Wigen, and Desimone Trust

**CC:** Ms. Diane Decker, JSH Properties, Inc. Boston

**FROM:** Julie Wukelic, Hart Crowser, Inc.

**RE:** Environmental Review – Global Intermodal Systems Property  
7693 Denver

This memo summarizes our findings of the AdaPT report review (*Limited Environmental Compliance Audit, Global Intermodal Systems Property*, dated November 21, 2001) and site reconnaissance of the subject property of interest, the Global Intermodal Systems Property. The property is located at 1818 South 93rd Street in Seattle, Washington, near the west side of the Duwamish River. The property is currently leased by Global Intermodal Systems (GIS). The property is used as a container storage facility, including repair and maintenance of containers. The purpose of the review was provide an opinion on the AdaPT report and an additional environmental opinion for the property regarding current environmental conditions and operations. Edmonds

## SUMMARY OF FINDINGS AND RECOMMENDATIONS

Based on our report review, site reconnaissance, and discussions with Mark Gonzalez (GIS), there does not appear to be any obvious and/or significant environmental impacts to the subject property from the current and past use of the property as a container storage, maintenance, and repair facility. It appears that GIS has made and continues to make a conscious effort to maintain their equipment, storage areas, and waste storage areas with best management practices (BMPs). Since the November 2001 AdaPT report, GIS has cleaned out and filled a sump in the floor of the Genset Repair and Maintenance Shop and replaced the torn filter socks in their catch basins. Their housekeeping appears to have improved since the description in AdaPT's report. Appendix A contains a copy of the invoice of the subcontractor, Aqua Clean Jet-N-Vac, Inc., who cleaned out the sump. GIS appears to be conducting their current waste management practices, activities, and operations within current industrial standards for their type of business, and there does not seem to be a high risk for significant environmental impacts to the Duwamish River at this time. Jersey City

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Seattle, Washington 98102-3699  
Fax 206.328.5581  
Tel 206.324.9530

Juneau

Long Beach

Portland

DFT 000875



### ***Current and Future Use of the Property***

The continued use of the property by GIS should not have any significant impacts to the environmental conditions of the property. Restrictions on types of tenants GIS can lease their space to should be made. No tenants that use, store, or handle large quantities of hazardous substances on a regular basis should be allowed to use the property unless strict restrictions and compliance measures are undertaken before using the property. Businesses conducting vehicle repair, cleaning, and long-term storage and fueling; manufacturing; equipment and machine repair; and painting on the site should be discouraged to reduce potential environmental impacts to the property. Tenants should not allow the use of underground storage tanks (USTs) containing petroleum products and hazardous materials.

### ***On-Site Catch Basins***

Similar to AdaPT's recommendation, GIS should inspect the catch basins more frequently than twice a year to reduce the discharge of sediments into the storm water sewer. As stated by AdaPT, it was not clear whether the stormwater system is connected to the local sewer system in South 96th Street, or discharges directly to the Duwamish River. The City of Tukwila Building Department had no record of sewer system connecting to the Duwamish River. Based on our conversations with them, they had no record because it is private property. Mr. Gonzalez thought that it is possible that the catch basins might be connected to both the on-site wastewater treatment system and to the Duwamish River. Our site reconnaissance did not reveal an obvious outfall into the Duwamish River on the subject property. The river is currently running at a high level so it is possible that an outfall exists below the current water level.

Although past releases may have occurred through the on-site catch basins, the past known history of the property does not appear to have a long time operation of a business that could have significantly impacted the property over a long period of time. In addition, even if the catch basins were connected to the river, again, past businesses on the property do not indicate a high potential for significant and sustained releases to the river.

### ***Wastewater Treatment System***

According Mr. Gonzalez, GIS has operated on the property for the past 10 years and no violations have ever occurred on the property. Mr. Gonzalez said that they have not sampled and analyzed the wastewater treatment system since 1998. He pointed out that they have always been in compliance with their discharge permit and their operations have not changed since 1998. We recommend GIS collect and analyze at least one sample



from their system on an annual basis to document their compliance with the permit's discharge limits.

## REPORT REVIEW

Hart Crowser performed a review of the AdaPT report, "Limited Environmental Compliance Audit, Global Intermodal Systems Property, 1818 South 93rd Street, Seattle, Washington, 98108," dated November 20, 2001. The purpose of their limited audit was to evaluate the current on-site operations and activities for potential to have impacted the surface soil, subsurface soil, and groundwater of the property. The main focus of their audit was an extensive site visit to review their existing procedures and processes that occur on the site. They reviewed permit compliance, recordkeeping and reporting, and other on-site regulatory agency files.

The GIS site is listed on the RCRA database as a small quantity generator (SQG). There were no violations reported by AdaPT of any existing permits for the subject property. An undated site inspection sheet from the King County Local Hazardous Waste Management Property was reported by AdaPT and it concluded that the subject property was in regulatory compliance.

After AdaPT's file review and site reconnaissance, they concluded that there were no significant environmental concerns likely to have impacted the subsurface soils and groundwater beneath the subject property. They did note several minor housekeeping issues such as: torn or missing filter socks on the catch basins; an unused sump in the refrigerator shop; lack of apparent proper ventilation in the paint room; and open containers of cleaning solutions.

At the time of Hart Crowser's site visit on February 28, 2002, the sump had been cleaned out; new filter socks had been installed in the on-site catch basins; and no open containers of cleaning solutions were visible. Housekeeping appeared to be good. There was a solvent odor evident near the paint room but the paint room was near a major doorway of the Container & Equipment Repair and Maintenance Shop. GIS should continue to assess their worker health and safety practices and ventilation system in and around the paint room.



## **SITE RECONNAISSANCE**

We conducted a site reconnaissance of the subject property on February 28, 2002. Mr. Mark Gonzalez with GIS accompanied Hart Crower during the site reconnaissance. Our site reconnaissance focused on observing and noting site features previously addressed in AdaPT's report and potential environmental concerns. We attempted to observe any type of on-site storm sewer outfall into the Duwamish River from the subject property. No obvious outfall into the Duwamish River from the subject property was observed.

According Mr. Gonzalez, GIS has operated on the property for the past 10 years and no violations have ever occurred on the property. Mr. Gonzalez said that they have not sampled and analyzed the wastewater treatment system since 1998. He pointed out that they have always been in compliance with their discharge permit and their operations have not changed since 1998.

The subject property appeared to be in a similar and better condition than AdaPT's description of their visit in November 2001. The areas of concern had been cleaned up and housekeeping was improved. Site photographs were taken to document the observations.

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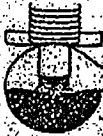
Attachment:

Appendix A - Aqua Clean Jet-N-Vac, Inc. Invoice

APPENDIX A  
AQUA CLEAN JET-N-VAC, INC. INVOICE

Hart Crowder  
7693 March 29, 2002

DFT 000879



AQUA CLEAN JET-N-VAC, INC.  
PO BOX 2056, RENTON, WA 98058  
SEWER DRAINAGE AND DATCH BASH CLEANING  
(425) 271-5459 1-800-842-5326

# INVOICE

INVOICE #

7425

DATE

02-21-02

**BILL TO:**

GLOBAL INTERMODEL  
1818 S 93RD  
SEATTLE, WA 98108

**SERVICE FOR:**

GLOBAL INTERMODEL  
1818 S 93RD  
SEATTLE, WA 98108

PURCHASE ORDER # MARK

TERMS: N 30, 1.5% ON PAST DUE

DESCRIPTION

AMOUNT

DUMP FEE  
SERVICE  
SALES TAX KING CO 8.8%

122.66  
607.50  
64.25

GLOBAL SYSTEMS  
Voucher # 660807  
AQUACLN Reference:  
5010 5545 794.41  
Date: 2-25  
2-26

TOTAL

794.41

DFT 000880